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Attorneys for Plaintiff

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA IN AND FOR THE COUNTY OF MARICOPA

STATE OF ARIZONA,

Plaintiff,

V.

DOUGLAS ROSS ZUBER, (001)

Defendant.

Case No:

63 SGJ 22

INDICTMENT

CHARGING VIOLATIONS OF:

COUNT 1: THEFT, a Class 2 Felony, in violation of A.R.S. § 13-1802(A)(1)

COUNT 2: FRAUDULENT SCHEMES AND ARTIFICES, a Class 2 Felony, in violation of A.R.S. § 13-2310

COUNT 3: MONEY LAUNDERING, a Class 3 Felony, in violation of A.R.S. § 13-2317

The Arizona State Grand Jury accuses Defendant, **DOUGLAS ROSS ZUBER**, charging on this 29th day of September, 2008 that in or from Maricopa County, Arizona:

COUNT 1

Between the approximate dates of January 1, 1999 and January 1, 2006, Defendant, **DOUGLAS ZUBER**, knowingly controlled Harvard Investments funds, of a value of \$25,000

or more with the intent to deprive Harvard Investments of such property, in violation of A.R.S. §§ 13-1802(A)(1), 13-1801, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 2

Between the approximate dates of January 1, 1999 and January 1, 2006, Defendant, **DOUGLAS ZUBER**, pursuant to scheme or artifice to defraud, knowingly obtained a benefit from Harvard Investments, by means of fraudulent pretenses, representation, promises, or material omissions, in violation of A.R.S. §§ 13-2310, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 3

Between the approximate dates of January 1, 1999 and January 1, 2006, Defendant, **DOUGLAS ZUBER**, acquired or maintained an interest in, transacted, transferred, transported,
received or concealed the existence or nature of racketeering proceeds, knowing or having
reason to know that the money was the proceeds of an offense, in violation of A.R.S. §§ 132317, 13-2301, 13-701, 13-702, 13-702.01 and 13-702.01.

Pursuant to A.R.S. § 21-425, the State Grand Jurors find that the offenses described above were committed in Maricopa County, Arizona.

True Bill")

TERRY GODDARD ATTORNEY GENERAL

STATE OF ARIZONA

ANDREI CHERNY

Assistant Attorney General

Dated:

ated: Septemble

29,2008

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State Grand Jury